

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK  
4:23-cv-05448-YGR

Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF CHRISTOPHER Y. L. YEUNG IN SUPPORT OF META  
DEFENDANTS' ADMINISTRATIVE MOTION TO COMPEL JOINT LETTER  
BRIEFING BY NEW YORK EXECUTIVE AGENCIES**

I, Christopher Y. L. Yeung, declare and state as follows:

1. I am a partner with the law firm Covington & Burling LLP. I represent Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (“Meta”) in this action. This declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. I submit this declaration, as required by Civil Local Rule 7-11, regarding the Meta Defendants’ Administrative Motion to Compel Joint Letter Briefing by the New York Executive Agencies.

3. Attached as **Exhibit 1** is a true and correct copy of an email dated January 16, 2025, with the subject line “Case Number: 4:22-md-03047-YGR.”

4. Attached as **Exhibit 2** is a true and correct copy of a transcript of the January 16, 2025 Discovery Management Conference in this multidistrict litigation.

5. Attached as **Exhibit 3** is a true and correct copy of emails dated January 16, 2025, with the subject line “Re: MDL 3047 – NY Agency Discovery.”



6. Attached as **Exhibit 4** is a true and correct copy of an email dated January 9, 2025, with the subject line “MDL 3047 – NY Agency Discovery.”

7. Attached as **Exhibit 5** is a true and correct copy of emails dated from March 3, 2025 to April 4, 2025, with the subject line “RE: Social Media MDL, N.D. Cal. No. 22-03047.”

8. Attached as **Exhibit 6** is a true and correct copy of emails dated from May 21, 2025 to July 21, 2025, with the subject line “RE: Social Media MDL, N.D. Cal. No. 22-03047.”

9. Five New York agencies—the Office of the Governor, the Council on Children and Families, the Department of Health, the Office of Mental Health, and the Office of Children and Family Services (the “Executive Agencies”)—reached document discovery agreements with Meta in January 2025 to resolve their document discovery disputes, and they announced to Your Honor that they had reached such agreements by January 16, 2025 email and at the January 16, 2025 Discovery Management Conference.

10. Meta now seeks to compel the Executive Agencies to litigate a dispute before Your Honor regarding the agencies’ refusal to honor the document discovery agreements. The Executive Agencies maintain that such a dispute must be litigated in New York. As such, Meta was unable to obtain a stipulation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed this 23rd day of July, 2025.



Dated: July 23, 2025

By: /s/ Christopher Y. L. Yeung

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